



# MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Martin O'Malley  
Governor

Shari T. Wilson  
Secretary

Anthony G. Brown  
Lieutenant Governor

Robert M. Summers, Ph.D.  
Deputy Secretary

January 15, 2010

Dear Sir/Madam:

Maryland and federal hazardous waste regulations establish reporting requirements for persons who manage hazardous waste. Code of Maryland Regulations (COMAR) 26.13.03.06B requires the filing of a report on hazardous waste generation and management once every two years. The report covers hazardous waste activity in the preceding calendar year.

Under Maryland regulations, persons are required to file a report if, at a given site, they:

(1) Either:

- (a) generate hazardous waste and ship it off-site to a facility within the United States; or
- (b) treat, store or dispose of hazardous waste on-site; and

(2) Are fully regulated under Maryland's hazardous waste regulations by:

- (a) generating, in a calendar month, 220 pounds or more of hazardous waste, or more than 2.2 pounds of acute hazardous waste; or
- (b) accumulating, at any time, more than 220 pounds of hazardous waste or more than 2.2 pounds of acute hazardous waste.

Our records indicate that you meet these reporting criteria. Enclosed is a federal Instruction and Forms Manual for use in completing the required report. The report must cover hazardous waste activity only for the calendar year ending December 31, 2009.

**The report must be completed and filed with the Maryland Department of the Environment, Technical Services and Operations Program, 1800 Washington Boulevard, Suite 610, Baltimore, MD 21230-1719. The deadline for filing is March 1, 2010.**

Failure to return an accurate and complete hazardous waste report by March 1, 2010 is a violation of Maryland and federal regulations and may result in you being subjected to administrative, civil and/or criminal penalties.

Persons may submit their 2009 Hazardous Waste Report electronically on a compact disk or a 3½" floppy disk. The accompanying page entitled "Electronic Reporting – 2009 Hazardous Waste Report" describes technical requirements for electronic reporting. **The electronic submission must be accompanied by a completed, signed paper copy of the RCRA Subtitle C Site Identification Form.** Persons are especially encouraged to file electronically if, at a given site, they generated

more than 13.2 tons of hazardous waste in calendar year 2009, or they operated a treatment, storage or disposal facility under authority of a Controlled Hazardous Substance Facility permit.

If you believe you have received this notification in error, please complete and sign the RCRA Subtitle C Site Identification Form and return it to the Technical Services and Operations Program at the above address.

Please read the enclosed instruction manual carefully to determine which forms are required of you. **Note, however, that Maryland's reporting requirement is more stringent than the federal reporting requirement. For the purposes of the instruction manual, consider yourself as "required to file" if you met any of the criteria listed above on hazardous waste generation and hazardous waste accumulation for calendar year 2009. Ignore the instructions on pages 2 and 3 of the instruction manual that limit reporting to federally-defined large quantity generators.**

The printed instructions say that you should file form OI "only if the site's state requires it." **Maryland does not require the filing of form OI.**

Information on materials not to be reported on Form GM (Generation and Management) can be found under "Wastes Not To Be Reported" on pages 32 – 34 of the instruction manual. Also take note of the enclosed "Key Points for Filing" document identifying additional Maryland-regulated wastes that must be included in the report, and providing information on reporting requirements concerning waste minimization/pollution prevention.

If you have any questions or need assistance, you may contact Mr. Paul Brian Sodeman or Mr. Floyd Owens at (410) 537-3314, or by email at [psodeman@mde.state.md.us](mailto:psodeman@mde.state.md.us) or [fowens@mde.state.md.us](mailto:fowens@mde.state.md.us), respectively. Additional information is also available on the Maryland Department of the Environment's Biennial Report web page, available from a link at [http://www.mde.state.md.us/Programs/LandPrograms/Hazardous\\_Waste/home/index.asp](http://www.mde.state.md.us/Programs/LandPrograms/Hazardous_Waste/home/index.asp).

Sincerely,

Hilary Miller, Program Manager  
Technical Services and Operations Program

Enclosure

HM:fo